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***VIA ECF***

February 3, 2023

The Honorable Ronnie Abrams  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

**Re: *Dakus v. Koninklijke Luchtvaart Maatschappij, N.V.*, 1:22-cv-07962-RA  
 Consented to Request to Modify Motion to Dismiss Briefing Schedule**

Dear Judge Abrams:

We represent Koninklijke Luchtvaart Maatschappij, N.V. (“KLM”) in the above-referenced matter. On January 23, 2023, KLM filed its Motion to Dismiss the Plaintiff’s First Amended Complaint (“Motion”). (ECF No. 19.) KLM’s counsel conferred yesterday with the plaintiff’s counsel, who stated that the plaintiff intends to rely on her current pleading and oppose the Motion, rather than filing an amended complaint. The parties have agreed respectfully to request modification of the briefing schedule for the Motion set by the Local Rules.

Subject to the Court’s approval, the parties suggest the following proposed modifications to the current briefing schedule:

Event	Current Schedule	Proposed Schedule
The plaintiff’s opposition is due	February 6, 2023	February 22, 2023
KLM’s reply is due	February 13, 2023	March 15, 2023

No prejudice to any party or inordinate delay results from granting the proposed briefing schedule and it will not affect any other dates in this action. No previous request for an extension of these deadlines have been requested.



The Honorable Ronnie Abrams  
February 3, 2023  
Page Two

Thank you in advance for your consideration of this request. KLM is available to discuss this request further at the Court's convenience.

Respectfully,

/s/ Keara M. Gordon  
Keara M. Gordon